

Decision 19-02-019 February 21, 2019

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2017. (U39M)

Application 15-09-001

**DECISION GRANTING INTERVENOR COMPENSATION TO
THE UTILITY REFORM NETWORK FOR
SUBSTANTIAL CONTRIBUTION TO DECISION 17-05-013**

Intervenor: The Utility Reform Network (TURN)	For contribution to Decision (D.) 17-05-013
Claimed: \$1,414,358.14	Awarded: \$1,386,671.79
Assigned Commissioner: Michael Picker	Assigned ALJ: Stephen C. Roscow

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	In Decision (D.) 17-05-013, the Commission authorized Pacific Gas and Electric Company's (PG&E's) general rate case (GRC) revenue requirement for 2017-2019. The Commission addressed a comprehensive settlement agreement between all active parties in the proceeding, which proposed to resolve all but the following two contested issues: (1) whether to add a third post-test year to PG&E's 2017 GRC cycle, and (2) whether PG&E should be authorized to establish a new balancing account to record costs to comply with gas leak management requirements that may emerge from R.15-01-008. The Commission in D.17-05-013 approved the settlement agreement with two modifications, and also resolved the two contested issues.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	10/29/15	Verified
2. Other specified date for NOI:		
3. Date NOI filed:	11/30/15	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	A.15-03-005	Verified
6. Date of ALJ ruling:	8/6/15	Verified
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b))		
9. Based on ALJ ruling issued in proceeding number:	A.15-03-005	Verified
10. Date of ALJ ruling:	8/6/15	Verified
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.17-05-013	Verified
14. Date of issuance of Final Order or Decision:	May 18, 2017	Verified
15. File date of compensation request:	July 17, 2017	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor's Comment(s)	CPUC Discussion
1	<u>Line 3</u> : TURN timely filed our original NOI on Nov. 30, 2015. TURN filed an amendment to our NOI on Jan. 6, 2016, to reflect our recently updated Articles of Incorporation and Bylaws.	Verified

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><u>Overview</u></p> <p>This GRC proceeding covered an array of issues associated with PG&E's gas and electric utility service. TURN sponsored 13 volumes of testimony from twelve witnesses on a wide variety of those issues. TURN made a number of recommendations, addressing almost every aspect of PG&E's operations. These recommendations included reducing overall Administrative and General and Human Resources spending, reducing ratepayer funding of the Short Term Incentive Plan (STIP), reducing Customer Care costs, reducing electric and gas distribution capital and expense items and related ratemaking adjustments for deferred or imprudent gas distribution spending, reducing electric generation capital and expense items and related ratemaking adjustments, reducing depreciation and rate base for numerous items, rejecting or</p>	<ul style="list-style-type: none"> D.17-05-013, p. 2 (adopting settlement agreement with two modifications, and resolving two contested issues) Joint Motion of the Office of Ratepayer Advocates (ORA), The Utility Reform Network (TURN), Alliance for Nuclear Responsibility (A4NR), Center for Accessible Technology (CforAT), Coalition of California Utility Employees (CUE), Collaborative Approaches to Utility Safety Enforcement (CAUSE), Consumer Federation of California (CFC), Environmental Defense Fund (EDF), Marin Clean Energy (MCE), Merced Irrigation District (Merced ID), Modesto Irrigation District (Modesto ID), National Diversity Coalition (NDC), Small Business Utility Advocates (SBUA), South San Joaquin Irrigation District (SSJID), and Pacific Gas and Electric Company (PG&E) for Adoption of Settlement Agreement, filed Aug. 3, 2016 ("Joint Motion") Joint Motion, Attachment 1 	Noted

<p>reducing funding for numerous real estate projects and activities, and rejecting certain political costs. TURN also opposed PG&E’s proposal to close up to 26 customer service offices, and offered policy recommendations related to safety, risk, and integrated planning; non-tariffed products and services; and Diablo Canyon, among other things. <i>See</i> Exhibits TURN-1 through TURN-13.</p> <p>Immediately after the submission of our testimony, TURN began participating in intense and prolonged settlement negotiations, which ultimately resulted in a settlement agreement resolving all of the disputed issues addressed in TURN’s testimony. TURN played a leading role (along with PG&E and ORA) throughout negotiations, reflecting the breadth and depth of our showing in the proceeding. No party addressed more issues than TURN but ORA, and TURN addressed some issues not covered by TURN.</p> <p>The Settlement Agreement recommended a test year revenue requirement increase for PG&E of \$88 million, as compared to its original request of \$457 million and request in rebuttal testimony of \$319 million. The settlement agreement proposed additional increases in post-test years 2018 and 2019 of \$444 million and \$361 million respectively. PG&E originally requested \$489 and \$390 for those years, but lowered its requests in rebuttal testimony to \$469 and \$368. In addition to these high-level numbers, the Settlement Agreement included detailed tables presenting budgets</p>	<p>(Settlement Agreement Among ORA, TURN, A4NR, CforAT, CUE, CAUSE, CFC, EDF, MCE, Merced ID, Modesto ID, NDC, SBUA, SSJID, and PG&E) (“Settlement Agreement”)</p> <ul style="list-style-type: none"> • Settlement Agreement, Appendix A (comparing the settlement outcomes on financial issues to PG&E’s request, ORA’s position, and TURN’s position, with notes attributing settlement outcomes to TURN, ORA, and other parties, as appropriate). 	
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<p>for every MWC or cost center covered by PG&E’s GRC, organized by PG&E exhibit and chapter. These tables show PG&E’s forecasts, proposed reductions by ORA and TURN, and the settlement outcome, and also include notes indicating the basis for the settlement outcome (such as “Adopts TURN’s partial adjustment”). The Settlement Agreement additionally contained numerous non-revenue requirement elements, such as reporting requirements, required showings in the next GRC, and other obligations placed on PG&E in response to the recommendations of intervenors.</p> <p>After very careful consideration, the Commission adopted this settlement agreement with two modifications in D.17-05-013. Historically, intervenors have faced some challenges in linking their litigation positions to the outcomes in a settled proceeding because of the confidential nature of settlement negotiations and the frequent “black box” nature of resulting settlement agreements. That is not the case here. Both the Joint Motion supporting the Settlement Agreement and Appendix A to the agreement itself make very clear that TURN’s efforts resulted in a substantial contribution to the settlement agreement and thus D.17-05-013.</p> <p>In the sections that follow, TURN demonstrates our substantial contribution associated with issues resolved by the Settlement Agreement by primarily citing to these documents for efficiency’s sake, where possible. For some issues, we additionally cite to our</p>		
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<p>testimony. TURN also clarifies that the issues identified below are not an exhaustive reflection of our contributions to the Settlement Agreement. TURN was actively involved with negotiating the terms of almost every aspect of the Settlement Agreement, whether our participation was called out in the Joint Motion or not. But due to the confidentiality requirements of Commission Rule 12.6, TURN is limited in what we can disclose regarding the negotiations themselves.</p> <p>TURN additionally made a substantial contribution to the Commission's resolution of the two contested issues not resolved by the settlement agreement, as demonstrated below.</p>		
<p>Outcome on Overall Revenue Requirement</p> <p><i>2017 Test Year Revenue Requirement</i></p> <p>TURN proposed reductions to PG&E's test year O&M forecasts across all departments of approximately \$160 million, plus \$145 million for companywide expenses. TURN additionally proposed capital expenditure reductions relative to PG&E's requests of approximately \$700 million in 2017, \$125 million in 2016, and \$150 million in 2015.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E's O&M forecasts across all departments by approximately \$70 million, and its companywide expense by \$91 million. On the capital expenditure side, the settlement agreement reduced</p>	<p><i>2017 Test Year Revenue Requirement</i></p> <ul style="list-style-type: none"> • Settlement Agreement, Appendix A, "Cost Summary" tables on pages 2 and 3 (comparing TURN's reductions to the settlement reductions) • Settlement Agreement, Appendix A, "Results of Operations Summary of Proposed Increase over Adopted 2016," p. 1 of 18. 	<p>Verified</p>

<p>PG&E’s request for 2017 by approximately \$118 million, its request for 2016 by \$31 million, and its request for 2015 by \$186 million.</p> <p>The upshot of these reductions is a very substantial decrease in PG&E’s 2017 authorized revenue requirement relative to its request, attributable in significant part to TURN’s efforts. Rather than the \$457 million increase proposed by PG&E, later reduced to \$319 million in rebuttal testimony, the Commission authorized an \$88 million increase. Comparing PG&E’s adjusted request to this outcome produces three years of savings for ratepayers of \$231 million per year, for a total of nearly \$700 million across the 2017 GRC cycle. This figure does not include the additional, albeit more modest savings, stemming from the post-test year ratemaking adjustments authorized by the Commission in D.17-05-013.</p> <p>TURN’s revenue requirement recommendations contributed materially to these reductions for the test year 2017 revenue requirements.</p> <p><i>Post-Test Year Ratemaking Adjustments for 2018 and 2019</i></p> <p>TURN developed primary and alternate forecasts for post-test year ratemaking (PTYR), both using a two-part PTYR mechanism that escalates O&M expenses using a broad index and bases capital-related attrition on a forecast of attrition-year plant, using the Commission’s traditional historical averaging method to develop the forecast. TURN’s two proposals used</p>	<p><i>Post-Test Year Ratemaking Adjustments for 2018 and 2019</i></p> <ul style="list-style-type: none"> • Joint Motion, p. 12 (addressing Section 3.1.1.2 of the Settlement Agreement) • Settlement Agreement, Section 3.1.1.2 • Settlement Agreement, Appendix B, “Post-Test Year Settlement Amounts” • Ex. TURN-12, p. 17 	<p>Verified, in part. The Settlement Agreement adopted fixed dollar amounts rather than TURN’s proposed forecast model. However, we agree that TURN contributed to the overall reductions and to providing cost containment incentives.</p>
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<p>different indices to escalate dollars in TURN's model. For O&M, TURN used CPI-U in its primary proposal and CPI-U plus 50 basis points in its alternate proposal. For capital, TURN used CPI-U to adjust nominal capital expenditures to constant year capital expenditures in its primary recommendation, as compared to a weighted average of the Global Insight capital indices in its alternate proposal. Based on this methodology, TURN offered the following primary and alternate forecasts in Ex. TURN-12:</p> <p>Primary: \$469 million (2018); \$250 million (2019)</p> <p>Alternate: \$458 million (2018); \$290 (2019)</p> <p>As TURN explained in Ex. TURN-12, TURN's primary and alternate proposals for the PTYR mechanism reflect the short-term tax effects associated with lower capital expenditure levels, which generally cause an increase in the revenue requirement as compared to the higher capital spending level assumptions in PG&E's methodology. In December 2015, federal tax law changed, extending bonus depreciation through 2019 and permanently extending the research tax credit. TURN noted the long-term benefits to ratepayers from lower capital expenditures in 2018 and 2019, despite the near-term higher revenue requirement, because these tax benefits will ultimately reverse, leaving the ratepayers paying higher rates in the long term.</p> <p>ORA also offered primary and alternate proposals of \$274 (2018) / \$283 (2019) and \$444 (2018) / \$361 (2019). Given the very</p>		
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<p>unusual tax effects at play in PTYR in this proceeding, the range of dispute was much smaller than usual.</p> <p>The Settlement Agreement did not resolve the methodological dispute among parties but adopted fixed dollar amounts. As a compromise among the positions of PG&E, TURN, and ORA, it adopted ORA's alternative proposal for 2018, \$444, which was lower than both of TURN's proposals but higher than ORA's primary recommendation. For 2019, the Settlement Agreement adopted ORA's alternative proposal of \$361, which was higher than both of TURN's proposals and ORA's primary recommendation. The Commission adopted these fixed dollar amounts in D.17-05-013.</p> <p>Compared to PG&E's updated request, the Settlement Agreement reduced PG&E's 2018 PTYR adjustment by \$25 million (\$469 vs. \$444), for a total GRC cycle reduction of \$50 million. The Settlement reduced PG&E's 2019 PTR adjustment by \$7 million (\$368 vs. \$361). In sum, Section 3.1.1.2 will save ratepayers \$57 million and provide PG&E some cost containment incentives.</p>		
<p><u>Gas Distribution</u></p> <p>TURN proposed a number of adjustments to PG&E's forecast for gas distribution O&M and capital, including approximately \$5 million in expense adjustments and \$406 million in capital reductions for 2017. The \$5 million figure for expense adjustments reflects the net effect</p>	<ul style="list-style-type: none"> • Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN's gas distribution adjustments for 2017, as presented in Ex. TURN-2, Ex. TURN-4, and Ex. TURN-8) • Joint Motion, pp. 12-13 (summarizing Section 3.1.2 of the Settlement Agreement) 	<p>Verified</p>

<p>of TURN's proposed reductions, which were larger than \$5 million, and proposed increases, relative to PG&E's request.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduces PG&E's forecast by \$18 million in gas distribution expense. TURN's advocacy is reflected in the \$5.2 million reduction for corrosion control (MWC DG and FH); \$2.5 million reduction for leak management (MWC FI); and the \$0.5 million reduction for gas distribution other support activities (MWC AB).</p> <p>The Settlement Agreement additionally reduced PG&E's forecast by \$10 million in gas distribution capital in 2017. This reduction was in response to TURN's recommendations for new business (MWC 29).</p> <p>TURN also proposed adjustments to PG&E's forecasts of 2015 and 2016 gas distribution capital spending in Ex. TURN-1, Ex. TURN-2, and Ex. TURN-4. Those adjustments are reflected in other parts of the Settlement Agreement, as explained below.</p>	<ul style="list-style-type: none"> • Settlement Agreement, Appendix A, O&M Expense Table, p. 4 of 18 (attributing the gas distribution adjustments as follows: MWC DG to TURN; MWC FH to TURN and ORA; MWC FI to TURN, ORA, and CFC; and MWC AB to TURN) • Settlement Agreement, Appendix A, Capital Expenditures Table, p. 11 of 18 (attributing the gas distribution adjustment for customer connects to TURN) 	
<p><u>Electric Distribution</u></p> <p><i>Financial Issues</i></p> <p>TURN proposed a number of adjustments to PG&E's forecast for electric distribution O&M and capital, including approximately \$24 million in expense adjustments and \$171 million in capital reductions for 2017.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E's forecast by \$7 million in electric distribution expense. TURN's advocacy is reflected in</p>	<p><i>Financial Issues</i></p> <ul style="list-style-type: none"> • Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN's electric distribution adjustments, as presented in Ex. TURN-3, Ex. TURN-4, and Ex. TURN-5) • Joint Motion, pp. 13-14 (summarizing Section 3.1.3 of the Settlement Agreement) • Settlement Agreement, Appendix A, O&M Expense Table, pp. 4 of 18 to 5 of 18 (attributing the electric 	<p>Verified</p>

<p>the \$2 million reduction for overhead maintenance (MWC KA); \$1.2 million reduction for capacity, including the Voltage and Volt-Ampere Reactive Optimization (VVO) program (MWC BA, JV); and \$2.5 million reduction for mapping and records management (MWC GE).</p> <p>The Settlement Agreement additionally reduced PG&E's forecast by \$107 million in electric distribution capital in 2017. TURN's advocacy is reflected in the \$7 million reduction for reliability (MWC 49)¹; \$10 million reduction for substation asset management (MWC 48); \$40.5 million for capacity projects, including those in support of the VVO and Distributed Energy Resource Integration Capacity (DERIC) programs (MWC 06, 46, 2F); and \$43.4 million reduction for new business (MWC 16).</p> <p><i>Reporting Requirements</i></p> <p>The Settlement Agreement also reflects TURN's advocacy related to the Surge Arrestor Grounding Program and Line Extension Data Collection in certain new reporting requirements. First, as the Joint Motion Explains, PG&E will report annually on the progress of work in the Surge Arrestor Grounding Program to address TURN's concerns about PG&E's unit forecast, presented in Ex. TURN-3. Second, PG&E will include in future GRCs the specific information about Line Extension that TURN proposed, which is a subset of the data historically provided in the annual</p>	<p>distribution adjustments as follows: MWC KA to TURN and ORA; MWC BA/JV to TURN and ORA; and MWC GE to TURN and ORA)</p> <ul style="list-style-type: none"> • Settlement Agreement, Appendix A, Capital Expenditures Table, p. 11 of 18 (attributing the electric distribution adjustments as follows: MWC 49 to TURN; MWC 48 to TURN; MWC 06, 46, 2F to TURN and ORA; and MWC 16 to TURN and ORA) <p><i>Reporting Requirements</i></p> <ul style="list-style-type: none"> • Joint Motion, p. 35 (addressing Section 3.2.2.3 of the Settlement Agreement re: Surge Arrestor Progress Report) • Settlement Agreement, Section 3.2.2.3 • Joint Motion, p. 36 (addressing Section 3.2.2.7 of the Settlement Agreement re: Line Extension Reporting) • Settlement Agreement, Section 3.2.2.7 	
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¹ The revenue requirement impacts of this adjustment are offset by the Settlement Agreement provision increasing FLISR installations in response to CUE's position by \$8.5 million. See Settlement Agreement, Attachment A, at 11 of 18.

Line Extension Report that will be discontinued.		
<p><u>Energy Supply</u></p> <p>TURN proposed a number of adjustments to PG&E's forecast for generation O&M and capital, including approximately \$11 million in expense adjustments and \$23 million in capital reductions for 2017.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E's forecast by \$5 million in generation expense. TURN's advocacy is reflected in the \$0.5 million reduction for hydro operations (MWC AX, KH, KI).</p> <p>Moreover, the Settlement Agreement reflects TURN's advocacy related to Diablo Canyon through the non-financial provisions in Section 3.2.3.1. As the Joint Motion explains, a number of issues raised by TURN, also by A4NR, about license renewal for Diablo Canyon were resolved by PG&E's decision to seek Commission approval to retire Diablo Canyon at the end of its current NRC licenses. However, the Settlement Agreement addresses TURN's (and A4NR's) concerns about PG&E's request for pre-approval of the Unit 2 generator stator replacement project. PG&E withdrew that request, and agreed that if it proceeds with the project, the project and associated costs will be subject to review in its next GRC application.</p>	<ul style="list-style-type: none"> • Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN's energy supply adjustments, as presented in Ex. TURN-6) • Joint Motion, p. 15 (summarizing Section 3.1.4 of the Settlement Agreement) • Settlement Agreement, Appendix A, O&M Expense Table, p. 5 of 18 (attributing the energy supply adjustments as follows: MWC AX, KH, and KI to TURN and ORA) • Joint Motion, pp. 37-38 (addressing Section 3.2.3.1 of the Settlement Agreement re: Diablo Canyon) 	<p>Verified, in part. Section 3.2.3.1.2 of the Settlement Agreement states that "PG&E withdraws its request for pre-approval of the Unit 2 main generator stator project in this proceeding." TURN should be compensated for this contribution to D.17-05-013 (i.e., Exhibit TURN-06, Section II.B., "Diablo Canyon Nuclear Plant, Capital Spending: Unit 2 Stator Upgrade"). However, as TURN acknowledges, the issues raised by TURN regarding license renewal for Diablo Canyon were resolved by PG&E's decision to seek Commission approval to retire Diablo Canyon at the end of its current NRC licenses. TURN should not be compensated for its work on license renewal issues (i.e., Exhibit TURN-06, Section II.A., "Diablo Canyon</p>

		<p>Nuclear Plant, Policy”), because the Commission addressed PG&E’s request in D.18-01-022 in A.16-08-006. TURN witness Marcus claimed 9.25 hours for Diablo Canyon-related work, and should be compensated for 50% of those hours. TURN attorney Freedman claimed 23.25 hours for Diablo Canyon-related work, and should be compensated for 50% of those hours.</p>
<p><u>Customer Care</u></p> <p><i>Financial Issues</i></p> <p>TURN proposed a number of adjustments to PG&E’s forecast for customer care, including approximately \$103 million in expense adjustments.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E’s forecast by \$31 million in customer care expense. TURN’s advocacy is reflected in the \$7 million reduction for customer engagement (MWC EZ, FK, IV); \$14.7 million reduction for pricing products (MWC EZ); \$3.8 million reduction for contact centers (MWC DK); \$1.0 million reduction for metering (MWC AR); and \$3.2 million reduction for billing, revenue, and credit (MWC IS). Approximately \$18</p>	<p><i>Financial Issues</i></p> <ul style="list-style-type: none"> • Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN’s customer care adjustments, as presented in Ex. TURN-8) • Joint Motion, p. 16 (summarizing Section 3.1.5 of the Settlement Agreement) • Settlement Agreement, Appendix A, O&M Expense Table, p. 6 of 18 (attributing the customer care adjustments as follows: MWC EZ to TURN and ORA; MWC FK to TURN, ORA, MMID and SSJID; MWC IV to TURN and ORA; MWC DK to TURN and ORA; MWC AR to TURN; and MWC IS to TURN and ORA) • Settlement Agreement, Appendix A, Capital Expenditures Table, p. 	<p>Verified</p>

<p>million of these reductions are associated with the movement of costs associated with the Residential Rate Reform OIR (R.12-06-013) to a memo account for future review elsewhere.</p> <p>The Settlement Agreement additionally reduced PG&E's forecast by \$1.3 million in capital in 2017. This adjustment reflects the movement of costs associated with the Residential Rate Reform OIR (R.12-06-013) to a memo account for future review elsewhere.</p> <p>While D.17-05-013 adopted the financial impacts of Section 3.1.5.2 of the Settlement Agreement, related to PG&E's recovery of 2015-2016 and 2017-2019 costs recorded in the Residential Rate Reform Memorandum Account, the Commission rejected the vehicle for review and recovery of those costs proposed in Section 3.1.5.2. The Commission pointed to TURN's testimony, Ex. TURN-8, as well as ORA's, in concluding that the Settlement terms were not supported by the record. Instead, the Commission adopted revisions to Section 3.1.5.2 proposed by the Settling Parties, including TURN, in comments on the Alternate Proposed Decision (APD). The Commission found that the revised Section 3.1.5.2 "addresses the concerns identified in the PD and APD" and should be adopted.</p> <p><i>Customer Service Office Closures</i></p> <p>TURN also opposed PG&E's proposal to close 26 customer service offices (CSOs). TURN presented an extensive analysis demonstrating that PG&E did not meet its burden of showing that closing these CSO would be in</p>	<p>12 of 18 (attributing the customer care adjustment to MWC 2F to TURN and ORA)</p> <ul style="list-style-type: none"> • D.17-05-013, pp. 95-97 (analyzing and rejecting Section 3.1.5.2 of the Settlement Agreement related to Residential Rate Reform Memorandum Account cost recovery); pp. 224-225 (discussing and adopting revised Section 3.1.5.2) <p><i>Customer Service Office Closures</i></p> <ul style="list-style-type: none"> • Ex. TURN-7 (Testimony of Hayley Goodson and Jeffrey Nahigian) • Joint Motion, p. 41. • Settlement Agreement, Section 3.2.4.3 	
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<p>the best interest of customers because (1) PG&E did not address the needs and preferences of customers who use these CSOs; (2) customers continue to rely on these CSOs for payment and nonpayment transactions; and (3) PG&E did not demonstrate that alternatives available to customers using these CSOs would provide reasonably comparable levels of service.</p> <p>ORA and CUE likewise opposed PG&E's proposal.</p> <p>Pursuant to Section 3.2.4.3 of the Settlement Agreement, PG&E withdrew this request. The settlement agreement authorizes PG&E to file a new application seeking to close local offices no earlier than July 1, 2018.</p>		
<p><u>Shared Services</u></p> <p>TURN proposed a number of adjustments to PG&E's forecast for shared services O&M and capital, including approximately \$18 million in expense adjustments and \$102 million in capital reductions for 2017.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E's forecast by \$7.5 million in shared services expense. The Settlement Agreement additionally reduced PG&E's forecast by \$5.4 million in shared services capital in 2017 for corporate real estate (MWC 23). This capital adjustment is the result of TURN's advocacy.</p>	<ul style="list-style-type: none"> • Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN's shared services adjustments, as presented in Ex. TURN-3 and Ex. TURN-8) • Joint Motion, p. 21 (summarizing Section 3.1.6 of the Settlement Agreement) • Settlement Agreement, Appendix A, Capital Expenditures Table, p. 12 of 18 (attributing the shared services adjustment to MWC 23 to TURN) 	Verified
<p><u>Human Resources</u></p> <p>TURN proposed a number of adjustments to PG&E's forecast for human resources (HR),</p>	<ul style="list-style-type: none"> • Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN's HR department adjustments) and p. 3 of 18 (summary of TURN's 	Verified

<p>including approximately \$132 million for HR expense.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E's forecast for the HR department by \$0.9 million and for companywide HR expense by \$83 million. TURN's advocacy is reflected in the \$72.3 million adjustment for the Short-Term Incentive Plan (STIP); \$5.2 million adjustment for medical and other benefits programs; \$2.6 million for various non-qualified pension and defined contribution plans; \$1.1 million for workers' compensation; and \$2.1 million for severance/workforce transition.</p>	<p>companywide HR adjustment), as presented in Ex. TURN-6 and Ex. TURN-9</p> <ul style="list-style-type: none"> • Motion, pp. 22-23 (summarizing Section 3.1.7 of the Settlement Agreement) • Settlement Agreement, Appendix A, A&G Table, p. 9 of 18 (attributing the companywide expense adjustments as follows: \$72 million for STIP to TURN and ORA; \$4.7 million for Medical Programs to TURN; \$2.6 million for pensions to TURN and ORA; \$1.1 million for workers' comp to TURN and ORA; \$2.1 million for severance/workforce transition to TURN) 	
<p><u>Administrative and General (A&G)</u></p> <p>TURN proposed a number of adjustments to PG&E's forecast for A&G, including approximately \$1.2 million for the A&G department and \$11.8 million for companywide A&G expense.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E's forecast for the A&G department by \$1.8 million and for companywide A&G expense by \$7.7 million. For the A&G department costs, TURN's advocacy is reflected in adjustments of \$0.8 million for Regulatory Affairs and \$0.1 million for Corporate Affairs. For companywide A&G expense, TURN's advocacy is reflected in the following adjustments: \$0.1 million for bank fees; \$1.2 million for directors' and officers' (D&O) liability insurance; \$3.4 million for general liability insurance; \$2.2 million for nuclear property</p>	<ul style="list-style-type: none"> • Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN's A&G department adjustments) and p. 3 of 18 (summary of TURN's companywide A&G adjustment), as presented in Ex. TURN-6 • Motion, p. 23 (summarizing Section 3.1.8 of the Settlement Agreement) • Settlement Agreement, Appendix A, A&G Table, p. 8 of 18 (attributing the A&G department adjustments as follows: Regulatory Affairs adjustment to TURN and ORA; Corporate Affairs adjustment to TURN and ORA); p. 10 of 18 (attributing the companywide expense adjustments as follows: bank fees to TURN; D&O liability insurance to TURN, ORA, and CFC; general liability insurance to TURN, ORA, and CFC; nuclear property insurance to TURN; and director fees and expenses to TURN) 	Verified

insurance; and \$0.3 million for Director fees and expenses.		
<p><u>Technical and Accounting Issues</u></p> <p>TURN proposed a number of adjustments to PG&E's forecast for various technical and accounting issues, including depreciation, 2015 and 2016 capital expenditures, customer deposits, working cash, and other operating revenue.</p> <p>The Settlement Agreement adopted by D.17-05-013 reflects TURN's advocacy in these areas.</p> <p><i>Depreciation</i></p> <p>TURN proposed life-curve combinations and net salvage values for electric distribution, gas distribution, and common plant that would reduce PG&E's forecast by \$184 million, based on 2014 year-end plant balances. TURN also proposed longer lives for certain generation assets, which would further reduce PG&E's depreciation expense. The Settlement Agreement reduced PG&E's depreciation request by \$67 million, as a compromise of the positions of PG&E, ORA, TURN, A4NR, and CUE.</p> <p><i>2015 and 2016 Capital Expenditures</i></p> <p>TURN and ORA both proposed reductions to 2015 and 2016 capital. TURN recommended \$150 million in reductions for 2015 capital and \$125 million in reductions for 2016 capital based on our analysis of the</p>	<ul style="list-style-type: none"> Joint Motion, pp. 24-28 (addressing Settlement Agreement, Section 3.1.9) <p><i>Depreciation</i></p> <ul style="list-style-type: none"> Ex. TURN-11; Ex. TURN-6, pp. 27-30 (survivor curves for generation assets) Joint Motion, p. 24 (addressing Settlement Agreement, Section 3.1.9.1) <p><i>2015 and 2016 Capital Expenditures</i></p> <ul style="list-style-type: none"> Joint Motion, p. 25 (addressing Settlement Agreement, Section 3.1.9.2) Settlement Agreement, Appendix A, p. 2 of 18 (summary of TURN's 2015 and 2016 capital adjustments, as presented in Ex. TURN-1, Ex. 	<p>Verified</p> <p>Verified, the Settlement Agreement reduced PG&E's depreciation request as a compromise of the positions of PG&E, ORA, TURN, A4NR, and CUE.</p> <p>Verified</p>

<p>reasonableness of specific capital projects, including gas distribution, electric distribution, energy supply, and corporate real estate.</p> <p>The Settlement Agreement reduced 2015 capital by \$186 million to generally align with 2015 recorded costs, as proposed by ORA, plus an additional \$10 million reduction in response to TURN's position that that some of PG&E's spending on the gas distribution Pathfinder project in 2014 and 2015 should be disallowed because of imprudent recordkeeping.</p> <p>The Settlement Agreement reduced 2016 capital by \$31 million, with \$15 million attributed to TURN's position on PG&E's imprudent gas distribution leak management spending and \$10 million attributed to TURN's position on the forecast of gas distribution customer connects.</p> <p><i>Customer Deposits, Rate Base, and Related Issues</i></p> <p>TURN proposed a \$7 million reduction in PG&E's revenue requirement associated with customer deposits. TURN also proposed adjustments to PG&E's forecast of working cash equal to \$94.5 million.</p> <p>The Settlement Agreement adopted by D.17-05-013 reduced PG&E's revenue requirement by \$6.4 million by using a compromise between TURN's and ORA's estimates of the short-term interest rate for customer deposits. The Settlement Agreement additionally adopts TURN's and ORA's forecast of purchased power expense in the lead-lag calculation; a</p>	<p>TURN-2, Ex. TURN-4, Ex. TURN-6, and Ex. TURN-8)</p> <ul style="list-style-type: none"> • Settlement Agreement, Appendix A, 2015-2016 Capital Expenditures Table, p. 14 of 18 to 17 of 18 (showing all of TURN's 2015 and 2016 capital adjustments) • Settlement Agreement, Appendix A, 2015-2016 Capital Expenditures Table, p. 14 of 18 (attributing a \$10 million reduction to 2015 capital in MWC 2F to TURN's position on the Pathfinder project; a \$15 million reduction to 2016 capital in MWC 50 to TURN's position on gas distribution leak management imprudence; and a \$10 million reduction in 2016 capital in MWC 29 for gas distribution customer connects) <p><i>Customer Deposits, Rate Base, and Related Issues</i></p> <ul style="list-style-type: none"> • Ex. TURN-6, pp. 61-83 (addressing fuel oil inventory, working cash issues -- other receivables, prepayments, Diablo Canyon outage prepayment, lead lag study, and customer deposits) • Joint Motion, pp. 25-27 (addressing Settlement Agreement, Section 3.1.9.4) • Settlement Agreement, Section 3.1.9.4 	<p>Verified</p>
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<p>compromise between TURN, ORA, and PG&E for the number of lag days (26) for the goods and services lag; and TURN's forecast for other receivables and prepayments, which results in a reduction to rate base of \$20.2 million.</p> <p><i>Tax Accounting</i></p> <p>TURN did not address PG&E's forecast of income and property taxes in testimony. However, as the Joint Motion explains, TURN raised the issue of tax accounting changes during settlement negotiations. The negotiated result was Section 3.1.9.3 of the Settlement Agreement, which requires PG&E to create a two-way Tax Repair Memorandum Account to track during the term of this GRC the revenue requirement impacts resulting from certain changes in Federal or State tax law impacting repair deductions or accounting method changes. In D.17-05-013, the Commission agreed that PG&E should create a memorandum account to track differences between forecast and recorded tax expenses. The Commission expanded the purpose of the memorandum account, beyond the Settlement Agreement's focus on changes impacting repair deductions, to reach any revenue differences resulting from the income tax expense forecasted in this proceeding and the tax expenses actually incurred during the 2017-2019 GRC period.</p>	<p><i>Tax Accounting</i></p> <ul style="list-style-type: none"> • Joint Motion, pp. 25 (addressing Settlement Agreement, Section 3.1.9.3) • Settlement Agreement, Section 3.1.9.3 • D.17-05-013, pp. 116-117 	<p>As TURN acknowledges, in D.17-05-013 the Commission did not adopt Section 3.1.9.3 of the Settlement Agreement (D.17-05-013, OP 1.b). Instead, the Commission directed PG&E to establish a two-way tax memorandum account that would be structured identically to the memorandum accounts ordered by the Commission in previous decisions addressing GRC applications of SDG&E and SoCalGas (D.16-06-054) and Liberty Utilities (D.16-12-024). See D.17-05-013 at 115-118 and 225-229 and OP 11.</p> <p>TURN's efforts in settlement negotiations made no contribution to the Commission's decision regarding the tax memorandum account adopted in D.17-05-013. Therefore the hours are non-compensable due to lack of significant contribution.</p>
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<p><u>Principles for Deferred Work</u></p> <p>TURN raised a broad concern in its testimony with PG&E's practice of delaying or deferring work based on reprioritization, and then including that work in its forecasts here. TURN also recommended various capital disallowances for previously funded safety-related work that was not performed by PG&E in the 2014-2016 period, such as work concerning Aldyl-A Mains (MAT 14D), High Pressure Regulators (MWC 2K), Valves (MAT 50E) and Reliability Main Replacement (MAT 50A), on the grounds that deferring such work was contrary to principles set forth in Decisions 11-05-018 and 14-08-032.</p> <p>Section 3.2.8.4 of the Settlement Agreement responds to TURN's concerns about deferred maintenance and reprioritization. That provision summarizes principles articulated in the Commission's 2014 GRC decision on deferred work and PG&E's financial health. It also requires PG&E, for previously funded safety work that PG&E deferred and for which PG&E seeks future funding, to demonstrate how the funding request is consistent with the identified principles. This showing must be presented in PG&E's next GRC and its next Gas Transmission and Storage rate case.</p>	<ul style="list-style-type: none"> • Joint Motion, pp. 51-52 (addressing Settlement Agreement, Section 3.2.8.4) • Settlement Agreement, Section 3.2.8.4 • D.17-05-013, pp. 186-189 	Verified
<p><u>Risk Management & Integrated Planning</u></p> <p>In Ex. TURN-1, TURN described</p>	<ul style="list-style-type: none"> • Joint Motion, p. 53 (addressing Settlement Agreement, Section 3.2.8.8) • Settlement Agreement, Section 	Verified

<p>PG&E’s risk management and integrated planning process as “opaque” and recommended various improvements, including an explicit prioritization of PG&E’s proposed programs and projects.</p> <p>Section 3.2.8.8 of the Settlement Agreement requires that PG&E categorize its proposed risk mitigation programs and projects as either mandatory or discretionary. For the discretionary items, PG&E will be required to rank the items within a line of business by quintile (i.e., the programs and projects would need to be prioritized as within the top 20%, next 20%, etc.) or by a numeric ranking if such data is reasonably available. For work categorized as mandatory, PG&E will need to include information explaining why PG&E views the work as mandatory and also whether the work is a “best practice”.</p>	3.2.8.8	
<p><u>Showing Related to Affordability in Next GRC</u></p> <p>TURN witness Roger Colton demonstrated in Ex. TURN-13 that the affordability of PG&E’s rates, and the ability of its residential customers to absorb proposed rate increases, cannot be judged by comparing PG&E’s rates or average bills to the national average. This method is insufficient because the cost-of-living in California is substantially higher than elsewhere in the country and varies significantly across the counties in PG&E’s service territory. Due to the high cost-of-living here, even moderate</p>	<ul style="list-style-type: none"> • Ex. TURN-13 (Testimony of Roger Colton) • Settlement Agreement, Section 3.2.4.10 (“Economic Circumstances”) 	Verified

<p>income customers in PG&E's service territory have insufficient incomes to meet the cost-of-living in their respective communities as measured by the Self-Sufficiency Income. For these reasons, any meaningful consideration of economic circumstances, and how those circumstances inform the affordability of proposed rate increases, must consider county-level cost of living data, in addition to service territory-wide data.</p> <p>Section 3.2.4.10 of the Settlement Agreement requires PG&E to provide certain information as part of its showing in its next GRC that will assist the Commission and parties in analyzing the affordability of PG&E's rate request. Such information includes, but is not limited to, cost of living data for each county in PG&E's service territory, as compared to the national average, for at least the five most recent years with available cost of living data. Hence, the information to be provided by PG&E in its next GRC will facilitate the kind of analysis conducted by Mr. Colton for TURN in this proceeding, to the benefit of the Commission and PG&E's ratepayers.</p>		
<p><u>Contested Issues</u></p> <p>The settlement agreement identified two contested issues: (1) whether to add a third post-test year to PG&E's 2017 GRC cycle, and (2) whether PG&E should be authorized to establish a new balancing account to record costs to comply with gas leak management requirements that</p>	<p><i>Third Post-Test Year</i></p> <ul style="list-style-type: none"> • D.17-05-013, pp. 197-198, pp. 229-230 • Joint Motion, p. 55 • Settlement Agreement, Section 4.1 • TURN/CAUSE Comments on Contested Issues, filed Aug. 18, 	<p>Verified</p>

<p>may emerge from R.15-01-008.</p> <p><i>Third Post-Test Year</i></p> <p>TURN opposed the proposal of PG&E and ORA to add a third post-test year to PG&E's 2017 GRC cycle. TURN argued that the Commission twice recently rejected appeals for a third post-test year; the record contains no evidence in support of a third post-test year; and extending this GRC to 2020 would delay PG&E's first RAMP filing by a year. Other parties also opposed a third post-test year, including CAUSE, A4NR, and CFC. Later, TURN opposed the recommendation of ORA and PG&E that the PD (which proposed to reject the third post-test year as premature) be modified to find the 2019 attrition adjustment reasonable for 2020 if the Commission adopts a four-year GRC cycle prior to PG&E's next GRC filing.</p> <p>In D.17-05-013, the Commission declined to change the term of this GRC from three years to four years. The Commission pointed to D.16-06-005, issued in R.13-11-006, in which it determined that changing the GRC cycle was premature because of the status of the first S-MAP applications and RAMP, and noted that the first RAMP is only just beginning. It also noted the forthcoming report from Energy Division in R.13-11-006, which will address the merits of moving toward a longer GRC cycle, to be followed by Commission decision. The Commission concluded that it should not prejudge the outcome of that process here. The Commission also agreed with TURN (and A4NR) that it was unnecessary and inappropriate to</p>	<p>2016, pp. 2-10</p> <ul style="list-style-type: none"> • TURN Reply Comments on Contested Issues, filed Aug. 25, 2016, pp. 3-11 • TURN Reply Comments on the PD, filed 3/27/17, pp. 1-2 <p><i>Gas Leak Management Balancing Account</i></p> <ul style="list-style-type: none"> • D.17-05-013, pp. 200, 230 • Joint Motion, p. 55 • Settlement Agreement, Section 4.2 • TURN/CAUSE Comments on Contested Issues, filed Aug. 18, 2016, pp. 10-17 • TURN Reply Comments on Contested Issues, filed Aug. 25, 2016, pp. 11-17 • TURN Reply Comments on the PD, filed 3/27/17, pp. 2-4 (opposing the changes advocated by PG&E, EDF, and CUE) 	
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<p>address the revenue requirement for 2020 in this proceeding.</p> <p><i>Gas Leak Management Balancing Account</i></p> <p>TURN opposed the proposal of PG&E, EDF, and CUE to establish a balancing account to record costs to comply with gas leak management requirements that may emerge from R.15-01-008. TURN argued that it would be inappropriate and unnecessary to establish a balancing account, or indeed any type of ratemaking account, in this proceeding to track costs that are not the subject of this GRC, and are yet to be identified and authorized in Rulemaking 15-01-008. TURN suggested that the proper costs and any necessary cost recovery mechanism – whether a balancing account, a memorandum account, or some other mechanism – should be addressed in R.15-01-008, the proceeding that is addressing the underlying work to be done. CAUSE and CFC also opposed this proposal.</p> <p>In D.17-05-013, the Commission agreed with TURN that this proceeding is the wrong forum to determine cost recovery for these costs. The Commission explained, “We conclude that we should not decide this question in this GRC decision because it is now actively pending in R.15-01-008. The proposal to adopt the new balancing account is denied without prejudice.”</p>		
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office at the California Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: In addition to ORA, TURN had similar positions on one or more issues as the following parties: Alliance for Nuclear Responsibility (A4NR); Coalition of California Utility Employees (CUE); Collaborative Approaches to Utility Safety Enforcement (CAUSE); Consumer Federation of California (CFC); the National Diversity Coalition (NDC), which was represented by the National Asian American Coalition (NAAC); and the three Irrigation Districts, South San Joaquin, Merced, and Modesto.		Verified
<p>d. Intervenor's claim of non-duplication:</p> <p>TURN's work in a GRC is typically coordinated with other like-minded groups, and this case was no different. Our time records include a number of entries (all of those coded as "Coord" and also embedded in some of those coded "GP") for efforts devoted to communicating with the other intervenors about matters such as procedural strategies and issue area allocation.</p> <p>As is our regular practice in GRC-type proceedings, TURN closely coordinated with ORA from the earliest stages of the GRC in order to avoid and minimize duplication. Avoiding duplication entirely with ORA is nearly impossible (since the staff seeks to address nearly all issue areas covered by the utility application). Therefore the coordination effort with ORA aims to minimize duplication, and to ensure that where such duplication occurs TURN's witnesses are presenting distinct and unique arguments in support of the common or overlapping recommendations. As a result, the Commission ended up with a more robust record.</p> <p>TURN also worked to coordinate with the other parties with whom we had common interests and/or overlapping positions to avoid undue duplication where possible. For instance, TURN coordinated with A4NR on issues related to Diablo Canyon and the contested third post-test year issue. TURN coordinated with CUE on PG&E's proposal to close 26 customer service offices. TURN coordinated with CAUSE on issues related to safety and risk, and we filed joint comments on the two contested settlement issues. TURN coordinated with CFC on issue coverage in general. TURN also coordinated with NDC via NAAC on issues related to STIP and</p>		Noted. Although other parties made similar arguments, the arguments and exhibits provided by TURN were complimentary rather than duplicative which resulted in a more complete record.

² The Office of Ratepayer Advocates (ORA) was renamed the Public Advocate's Office at the California Public Utilities Commission, pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

<p>executive compensation. Finally, we conferred with the South San Joaquin, Merced, and Modesto Irrigation Districts about our shared interests in customer retention costs, resulting in TURN's leaving that issue to them to address in testimony.</p> <p>In sum, the Commission should find that TURN's participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
<p>TURN's request for intervenor compensation seeks an award of approximately \$1.4 million as the reasonable cost of our participation in the proceeding. In light of the scope and quality of TURN's work, and the benefits achieved through TURN's participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.</p> <p>The requested compensation amount is a very small fraction of the savings directly and indirectly attributable to TURN's work. TURN's efforts in this proceeding, taken together with the other parties to the Settlement Agreement, will save ratepayers \$750 million over the 2017 GRC cycle.³ As described above in the substantial contribution section, TURN can take credit for a substantial portion of this reduction. Moreover, TURN's efforts resulted in customer service benefits, particularly for the customers who use the 26 customer service offices that will stay open for the time being. TURN's efforts related to risk management and deferred work deemed necessary for safe and reliable service will also provide enhanced spending accountability for PG&E, to the benefit of ratepayers.</p> <p>The total amount of TURN's request is also reasonable in light of recent awards of compensation to TURN for work in the PG&E 2014 GRC and the SCE 2015 GRC. The Commission in D.15-08-023 awarded TURN approximately \$1.5 million in the PG&E 2014 GRC, and in D.16-04-011, approximately \$1.6 million in the SCE 2015 GRC. The similarity in dollar amount, despite the fact that this GRC settled while the other two did not, reflects several factors. First, TURN</p>	Noted

³ TURN provides these calculations in the section above discussing TURN's substantial contribution on the Overall Revenue Requirement for 2017, 2018, and 2019. In sum, \$750 million = (\$231 million x 3 years) + (\$25 million x 2 years) + (\$7 million x 1 year).

<p>presented more volumes of testimony, sponsored by more witnesses, in this proceeding.⁴ Second, settlement negotiations were extremely time-intensive for TURN attorneys, primarily Ms. Goodson, who devoted 185 hours to this activity. Finally, the work done in those other cases was in 2012-2014 for the PG&E 2014 GRC and in 2013-2015 for the SCE 2015 GRC. The hourly rates for TURN's experts and attorneys were lower in those earlier GRCs than for most of the work requested here, with the exception of TURN's time in 2015 here and in 2015 in the SCE 2015 GRC.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>TURN seeks compensation for approximately 4,800 hours of time devoted to this proceeding by our staff attorneys, staff expert, and outside consultants. The collective efforts of this team resulted in thirteen volumes of testimony, a settlement agreement adopted by the Commission in D.17-05-013 that reflects many of the recommendations presented by TURN, and the Commission's adoption of TURN's positions on the two non-settled issues. In the sections that follow, TURN describes the contributions of all members of our team and why the Commission should find that the hours incurred were reasonable, in light of our substantial contribution described in Section II above.</p> <p><u>TURN Attorneys</u></p> <p>Hayley Goodson served as TURN's lead and coordinating attorney throughout this proceeding. She also was responsible for covering several substantive issue areas, including post-test year ratemaking, customer deposits and cash working capital, and portions of customer care, HR, A&G, and electric distribution. Ms. Goodson additionally prepared and sponsored testimony as a TURN witness herself (Exhibit TURN-7). Finally, Ms. Goodson was TURN's lead representative throughout settlement negotiations, which lasted three months. Ms. Goodson's timesheets reflect this time commitment and the leading role played by TURN (with ORA) in negotiations. TURN seeks compensation for just over 500 of Ms. Goodson's hours here, or the equivalent of approximately 13 weeks of full-time work. While Ms. Goodson's hours are significant because of the extensive settlement negotiations, TURN notes that the time required of TURN's other attorneys who were much less active in negotiations was significantly lower because the case settled before going to evidentiary and briefing. Those activities tend to require significant time commitments from TURN's attorneys, which were avoided by the successful settlement negotiations.</p> <p>Six other TURN staff attorneys worked on this PG&E GRC: Tom Long, Robert Finkelstein, Marcel Hawiger, Matthew Freedman, Elise Torres, and Nina Suetake.</p> <p>Mr. Long, TURN's Legal Director, was very active throughout this proceeding. He covered gas distribution, safety and risk, and other policy and ratemaking issues. He also sponsored testimony on PG&E's quantitative risk models,</p>	<p>With the reductions made in this decision and further explained in Part III.D, the hours claimed are reasonable.</p>

⁴ TURN presented 13 volumes of testimony sponsored by 12 witnesses here. In the PG&E 2014 GRC, TURN presented 10 volumes of testimony sponsored by 9 witnesses. In the SCE 2015 GRC, TURN presented 9 volumes of testimony sponsored by 8 witnesses.

PG&E's deferral of work based on reprioritization, and gas distribution recordkeeping, Ex. TURN-1. And he worked closely with Ms. Goodson throughout settlement negotiations, particularly as negotiations pertained to his particular issue areas. TURN seeks compensation for approximately 420 of his hours here.

Mr. Finkelstein covered depreciation, corporate real estate, portions of A&G, miscellaneous revenues, and other policy and cost-of-service issues. He additionally prepared and sponsored testimony, Exhibit TURN-10, and worked closely with Ms. Goodson throughout settlement negotiations. TURN seeks compensation for approximately 290 of his hours here.

Mr. Hawiger, Mr. Freedman, Ms. Torres, and Ms. Suetake each covered discrete issue areas. Mr. Hawiger covered portions of electric distribution and customer care, as well as affordability issues. Mr. Hawiger also addressed the gas leak management issues with overlaps between this proceeding and R.15-01-008, where he has represented TURN. Mr. Freedman covered generation, particularly issues related to Diablo Canyon, an area in which he has particular expertise and extensive experience. Ms. Torres covered incentive compensation, and also helped with other HR and A&G issues. Ms. Suetake joined the GRC team in the spring of 2016, and took over responsibility for certain electric distribution, generation, HR, and A&G issues. The hours sought for each of these TURN attorneys are reasonable given the scope of their issue coverage in the proceeding.

TURN submits that our recorded attorney hours in this proceeding are reasonable, both as described above and as demonstrated in the wide-ranging substantial contribution TURN made in this proceeding. Therefore, TURN seeks compensation for all of the hours recorded by our attorneys and included in this request.

TURN Expert Eric Borden

Mr. Borden is TURN's in-house energy analyst who joined TURN in February 2015. Prior to TURN, Mr. Borden worked as a consultant in energy and finance for approximately seven years.

In this proceeding, Mr. Borden conducted discovery and analysis, and prepared testimony, Exhibit TURN-4, addressing several electric distribution topics, as well as one gas distribution topic. Specifically, Mr. Borden addressed various topics in PG&E-4, Chapter 13, "Electric Distribution Capital," PG&E-4, Chapter 17, "New Business and Work at the Request of Others," and one topic in PG&E-3, Chapter 8 related to forecast of new non-residential gas meters. Within these chapters, Mr. Borden analyzed expenditures related to distribution substation capacity projects (MWC 46), including adjustments to protect ratepayers from funding the same projects twice, as well as a new cost category, "Unidentified, Emergent Work," for forecast years 2015-2017. Mr. Borden's testimony sought to demonstrate why disallowances from 2015-2017 of \$53 million, \$57 million, and \$76 million, respectively, were necessary.

Among other issues, Mr. Borden provided analysis on historical forecasts versus

actual expenditures for distribution capacity projects, as well as project-level expenditures that were not warranted, and a new category of distribution capacity forecasting. Further, he closely scrutinized PG&E pilot data to demonstrate why the utility's volt-var optimization (VVO) program was unlikely to be cost-effective. And finally, he analyzed PG&E's regression model and various inputs to forecast new non-residential customers, arguing a lower non-residential meter forecast was more reasonable than PG&E's forecast. TURN requests compensation for approximately 230 hours of Mr. Borden's time.

Mr. Borden's work was distinct from TURN's other witnesses who addressed electric distribution issues, The Wired Group and Garrick Jones of JBS Energy. The Wired Group addressed the Distributed Energy Resource Integration Capacity (DERIC) program, part of MWC 06 presented in PG&E-4, Chapter 13. Mr. Borden addressed the same cost category and chapter, but his recommendations related solely to PG&E's Volt-var optimization (VVO) program from this section, which is distinct from the DERIC program. Mr. Borden's work was also distinct from that of Mr. Jones; the two addressed completely different chapters of Exhibit PG&E-4.

TURN Outside Consultants

JBS Energy

JBS Energy once again played an instrumental role in TURN's participation in this GRC by covering a broad array of issues, and conducting an in-depth review of past spending patterns and forecasts for this GRC.

The members of JBS Energy engaged in a thorough review of a broad array of issues, with a correspondingly substantial number of hours invoiced for the associated work of JBS Energy. This work was a critical part of TURN's success in this proceeding. In light of the breadth of TURN's substantial contribution and the dollar impact of many of our positions reflected in the settlement agreement, the Commission should have little trouble concluding that the requested number of hours and the associated intervenor compensation is a very cost-effective investment for PG&E's ratepayers.

Four members of JBS Energy's staff worked on the PG&E GRC on behalf of TURN, with three of them sponsoring testimony. William Perea Marcus's testimony, Exhibit TURN-6, covered generation, HR, A&G (other than incentive compensation), customer deposits, cash working capital, and depreciation related to generation. Garrick Jones prepared and sponsored Exhibit TURN-3, which addressed a range of electric distribution issues, including issues with IT crossover, such as mapping. Mr. Jones also assisted with analysis and discovery on HR, A&G, risk, and integrated planning. And John Sugar sponsored separate testimony on gas distribution and compensation issues, covered in Exhibits TURN-2 and TURN-9, respectively. Last but certainly not least, Greg Ruszovan has highly-developed data analysis, compilation and presentation skills, and played a critical role in developing and performing some of the analysis reflected in the testimony sponsored by other JBS Energy firm members. The Commission should find reasonable the requested amounts for the members of JBS Energy.

Jeffrey Nahigian

Jeffrey Nahigian, a long-time member of the JBS Energy firm now providing consulting services on his own, assisted TURN in reviewing PG&E's customer service and corporate real estate requests. Mr. Nahigian has covered these subject matters on behalf of TURN in a number of prior GRCs. Mr. Nahigian conducted discovery, prepared testimony, and assisted TURN during settlement negotiations regarding customer service and corporate real estate issues. He addressed both of these issue areas in Exhibit TURN-8. Mr. Nahigian also worked together with TURN attorney Hayley Goodson to analyze one of PG&E's customer service requests, the proposal to close 26 customer service offices. Mr. Nahigian and Ms. Goodson jointly sponsored Exhibit TURN-7, in which TURN opposed these closures.

Roger D. Colton, Fisher, Sheehan & Colton

TURN provided a first-of-its-kind analysis of the affordability of PG&E's current rates, and its proposed rate increase, for residential customers, in testimony prepared by Roger D. Colton of Fisher, Sheehan & Colton, Exhibit TURN-13. TURN offered this testimony in response to PG&E's claim that the average bills resulting from its GRC request would still be below the national average, and its suggestion that the California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) programs can address the affordability challenges faced by its customers. (Ex. PG&E-1, pp. 1-6 to 1-8).

Mr. Colton, a national expert on low-income utility issues (as explained below in Section III.C, Comment 3), examined the rates and usage of PG&E residential customers relative to the usage of residential customers elsewhere, recognizing that overall bills are a function not merely of rates but of usage as well, and examined the affordability of PG&E electric bills for customers with incomes above 200% of the Federal Poverty Level. His analysis additionally explained the need to take cost-of-living into account in examining the affordability of utility bills because the cost-of-living in California is substantially higher than elsewhere in the country. Mr. Colton found that even moderate income customers in PG&E's service territory have insufficient incomes to meet the cost-of-living in their respective communities as measured by the Self-Sufficiency Income. Thus, the unaffordability of PG&E bills is not limited to low-income customers. Finally, he examined the relative ability of PG&E customers to maintain service rather than facing the disconnection of service for nonpayment, or face unpaid account balances leading to various nonpayment collection activities. His examination of the extent to which PG&E customers fail to pay their bills showed that PG&E falls into the lower tiers of utility performance nationwide. Similarly, once they fall into arrears, PG&E customers have a more difficult time getting out of arrears to prevent the disconnection of service for nonpayment. Mr. Colton found that PG&E falls well into the bottom half of utilities nationwide with respect to the degree the utility is forced to utilize service disconnections as the collection activity of last resort. Based on his analysis, Mr. Colton concluded that PG&E can make no special claim to having affordable bills for residential customers, and that further increases in PG&E rates will result in a further

performance decline on each affordability factor he studied.

Section 3.2.4.10 of the Settlement Agreement requires PG&E to provide certain information as part of its showing in its next GRC that will assist the Commission and parties in analyzing the affordability of PG&E's rate request. Such information includes, but is not limited to, cost of living data for each county in PG&E's service territory, as compared to the national average, for at least the five most recent years with available cost of living data. As demonstrated in Ex. TURN-13, cost of living varies significantly across the counties in PG&E's service territory. Because of this variation, any meaningful consideration of economic circumstances, and how those circumstances inform the affordability of proposed rate increases, must consider county-level cost of living data, not simply service territory-wide data. Hence, the information to be provided by PG&E in its next GRC will facilitate the kind of analysis conducted by Mr. Colton for TURN in this proceeding, to the benefit of the Commission and PG&E's ratepayers.

The Wired Group

In this rate case, PG&E proposed a first-in-kind Distributed Energy Resource Integration Capacity ("DERIC") program, with a forecast three-year capital budget of about \$100 million, intended to pre-emptively reconductor certain circuits, upgrade certain substations, and upgrade certain capacitor banks and voltage regulation devices, with the ostensible goal of preventing potential future voltage or reliability problems as a result of high penetration levels of distributed generation.

Due to the significant policy and economic implications of this program, especially in light of policies concerning DER integration capacities being debated in the distributed resources plan rulemaking 14-08-013, TURN retained the services of the Wired Group to evaluate PG&E's request. The Wired Group is a consulting firm specializing in the evaluation of utility distribution system performance, and specifically evaluating the performance and potential of smart grid, demand response and distributed energy investments and opportunities. The Wired Group consults primarily for consumer and environmental advocates and for utility regulatory staff.

Experts Paul Alvarez, Dennis Stephens and Thomas Carter from The Wired Group devoted approximately 240 hours (160.75, 71 and 10 hours respectively) to conduct detailed discovery and prepare expert testimony concerning the DERIC program. Their testimony was identified as Exhibit TURN-5 in this proceeding. Mr. Alvarez and Mr. Stephens have not previously testified before the CPUC.

After fifteen years in product development and product management for Fortune 500 companies, Mr. Alvarez joined Xcel Energy in 2001 to oversee the development of energy efficiency and demand response programs for residential and commercial and industrial customers, as well as programs in support of voluntary renewable energy purchases and renewable portfolio standard compliance. After leaving Xcel in 2008, Mr. Alvarez went to private consulting where he conducted comprehensive evaluations of smart grid deployment performance in Colorado and Ohio. Mr. Alvarez founded the Wired Group in

2012 to focus exclusively on distribution utility performance measurement and utility customer value creation. He is the author of *Smart Grid Hype & Reality: A Systems Approach to Maximizing Customer Return on Utility Investment* (2014). Mr. Alvarez was the lead in developing discovery questions, analyzing data and writing testimony addressing policy issues and cost/benefit analyses regarding PG&E's DERIC program and alternative investments.

Mr. Stephens is a consultant with the Wired Group. He worked as an electrical engineer in distribution operations for Xcel Energy from 1975 to 2011. During that 35-year tenure he held a series of positions with increasing responsibility in areas of distribution design, planning, operations management, asset management, and the innovative use of technology to assist with these functions. As Director of Utility Innovations he worked with many software providers, including ABB, IBM, and Siemens, helping them develop distribution automation ideas into practical software applications of value to grid owners and operators. In 2009, he established a DER integration strategy and capability road-map for Xcel Energy. The technical project components focused on Boulder, which had the highest concentration of PV solar installations in Xcel Energy's eight-state electric service area. In this proceeding, Mr. Stephens conducted the analyses and wrote testimony concerning the technical grid distribution issues addressed by PG&E's DERIC program. Mr. Stephens analyzed the ostensible problems resulting from integrating distributed generation on PG&E's system and analyzed the technical need for the preemptive asset investments proposed as part of the DERIC program.

Mr. Carter is also a technical consultant for the Wired Group. Mr. Carter has over 30 years' experience developing and managing conservation, load management, and renewable energy programs for investor-owned utilities. Along with the marketing aspects of these programs he also managed technical electric and data communications issues between equipment vendors and distribution grid operations and planning. Mr. Carter has served as technical liaison with a variety of stakeholders in developing and securing approval for conservation and load management programs in New Mexico, Texas, and Colorado. Mr. Carter has testified and presented evidence before the Colorado Public Utility Commission. He is a veteran of the U.S. Air Force, and holds a Bachelor's degree in Electrical Engineering from the University of Colorado. Mr. Carter provided limited technical support in developing analyses and testimony but did not submit expert testimony under his own name.

As shown in the detailed resumes of witnesses Alvarez and Stephens in Exhibit TURN-5, these two witnesses are not only experts in distribution asset evaluation and distribution operations, but have specific technical expertise in evaluating smart grid solutions intended to optimize the use of distributed energy resources.

While normally TURN might not devote such detailed attention to one program that comprises about \$22 million in capital spending for the test year, the potential implications of the DERIC program warranted the use of consultants with engineering and program evaluation expertise to analyze the reasonableness of the DERIC program. The DERIC program addressed only upgrade 506 of PG&E's 3200 circuits and 5 of its 900 substations; so continuation of this program to

upgrade all circuits and substations would potentially cost billions of dollars in the future. Mr. Alvarez and Mr. Stephens demonstrated that the proposed asset investments were premature, and that PG&E had been able to successfully integrate distributed energy resources using its traditional distribution interconnection planning and upgrade procedures without incurring any problems. As explained in the substantial contribution section above, Section 3.1.3 of the Settlement Agreement reduced PG&E's 2017 capital forecast by \$40.5 million for capacity projects, including those in support of the DERIC program.

Catherine Yap of Barkovich & Yap

Catherine Yap, a principal of Barkovich & Yap, presented TURN's analysis and recommendation associated with post-test year ratemaking and attrition increases. Ms. Yap played a critical role not only in the development and presentation of TURN's position in testimony, Ex. TURN-12, but also with assisting TURN during settlement negotiations, both related to post-test year ratemaking and the RO Model. Ms. Yap additionally assisted TURN during the workshop at the beginning of the proceeding, where the RO Model was at issue, and during the workshop/evidentiary hearings held following the submission of the settlement agreement, during which post-test year ratemaking was an issue of focus. TURN requests slightly less than 250 hours in total for the work of Ms. Yap in this proceeding. The Commission should find reasonable the requested amount for her work.

Snively, King, Majoros, & Associates

TURN relied on Snively, King, Majoros & Associates for the development and presentation of TURN's depreciation testimony in this proceeding, Exhibit TURN-11. This was a return engagement for the firm, as it had provided expert witness services to TURN in several prior GRC proceedings during the 2000s. Michael Majoros, the firm's principal who had served as TURN's witness in the past, generally supervised the work of James Garren, a more junior firm member who performed the bulk of the analysis and testimony development. The total number of hours for members of Snively King for their work in this proceeding is substantially lower than the figure included in TURN's other relatively recent GRC proceedings for major energy utilities (223 total hours here as compared to approximately 300 hours in the PG&E 2014 GRC, for example). Consistent with their roles on this project, Mr. Garren recorded the majority of the hours.

TURN seeks compensation for the hours associated with work on depreciation-related issues. This includes the hours billed to TURN Snively, King, Majoros & Associates, and the hours recorded by TURN's staff attorney Finkelstein who handled the issue on behalf of TURN. Given TURN's substantial contribution on depreciation-related issues in the overall settlement context, the Commission should find reasonable all of the hours requested for work on those issues.

Other Issues

Review of PG&E's Post-D.17-05-013 Compliance Advice Letters

TURN has also included a very limited number of hours devoted to reviewing PG&E's Advice Letter 3851-G/5087-E, filed in compliance with D.17-05-013 on June 12, 2017. In that advice letter, PG&E provided "positive proof" that the revenue requirement adopted in D.17-05-013 is still just and reasonable, despite PG&E's announcement of \$300 million in budget cuts in January 2017, after the submission of the proposed settlement agreement. TURN submits that these 2 hours should be compensable, even though we ultimately determined that further action was unnecessary, because reviewing PG&E's showing was an important element of the case.

Meetings or Discussions Involving More Than One TURN Attorney or Expert

A relatively small percentage of hours and hourly entries reflect internal and external meetings involving two or more of TURN's attorneys and expert witnesses. In past compensation decisions, the Commission has deemed such entries as reflecting internal duplication that is not eligible for an award of intervenor compensation. This is not the case here. For the meetings that were among TURN's attorneys and expert witnesses, such meetings are essential to the effective development and implementation of TURN's strategy for this proceeding. None of the attendees are there in a duplicative role – each is an active participant, bringing his or her particular knowledge and expertise to bear on the discussions. As a result, TURN is able to identify issues and angles that would almost certainly never come to mind but for the "group-think" achievable in such settings.

There were also meetings with other parties at which more than one attorney represented TURN on occasion. The Commission should understand that this is often essential in a case such as this one, with a wide range of issues that no single person is likely to master. TURN's requested hours do not include any for a TURN attorney or expert witness where his or her presence at a meeting was not necessary in order to achieve the meeting's purpose. TURN submits that such meetings can be part of an intervenor's effective advocacy before the Commission, and that intervenor compensation can and should be awarded for the time of all participants in such meetings where, as here, each participant needed to be in the meeting to advance the intervenor's advocacy efforts.

Intervenor Compensation-Related Time

TURN is requesting compensation for 25 hours devoted to compensation-related matters, primarily 23.5 hours associated with preparation of this request for compensation. This request includes 22 hours of Ms. Goodson's time. Given her extensive knowledge of all aspects of this proceeding, she was the most efficient choice to prepare this request. Mr. Hawiger also contributed 1.5 hours of work on this compensation request, specifically related to the reasonableness of hours and hourly rates requested for the Wired Group, whose work Mr. Hawiger directly managed for TURN. The remaining 1.5 hours were associated with Ms. Goodson's preparation of TURN's NOI in 2015 and subsequent amendment to TURN's NOI in early 2016. TURN was in the process of updating our Bylaws and Articles of Incorporation at the time we filed our original NOI on November 30, 2015. Because those documents had not been finalized by TURN's Board of

<p>Directors, TURN indicated that it would amend its NOI as soon as those documents became available, and did so on January 6, 2016.</p> <p>While higher than the number of hours TURN tends to seek for compensation-related matters, this is a reasonable figure in light of the size and complexity of the request for compensation itself. The number of hours devoted to a request for compensation is driven in large part by the number of individuals and daily time entries involved in the substantive work. For example, the greater the number of individuals and associated time entries, and the greater the likelihood that the request will need to address a new hourly rate for some of those individuals. In this case, TURN additionally needed to present a showing supporting first-time hourly rates for several of our new expert witnesses. TURN's request for compensation for 23.5 hours for preparation of this claim falls well within the range of hours found reasonable by the Commission in decisions addressing TURN's intervenor compensation requests in recent GRCs. <i>See</i> D.13-08-022 (SCE 2012 GRC), awarding compensation for <u>28.25 hours</u> for claim preparation; D.14-05-015 (Sempra Utilities 2012 GRC), awarding compensation for <u>24.5 hours</u> for claim preparation; D.15-08-023 (PG&E 2014 GRC), awarding compensation for <u>28.5 hours</u> for claim preparation; D.16-04-011 (SCE 2015 GRC), awarding compensation for <u>21.25 hours</u> for claim preparation; and D.16-11-004 (Sempra 2016 GRC), awarding compensation for <u>20 hours</u> for claim preparation.</p> <p><u>Reasonableness of TURN's Direct Expenses</u></p> <p>TURN includes within this request our direct expenses associated with photocopies, postage, telephone expense, and legal research through Lexis, totaling \$301.39. TURN's expenses are significantly lower than is typical for a GRC because the proceeding settled before evidentiary hearing, which avoided much of the copying expenses associated with hearing exhibits and lengthy post-hearing briefs. For instance, in the most recently completed SCE GRC, A.13-11-003, TURN requested and received compensation for \$2,688.82 in copying expense, compared to our copying costs of \$55.15 here. <i>See</i> D.16-04-011, p. 24. The Commission should find that our very modest direct expenses are reasonable and award compensation.</p>	
<p>c. Allocation of hours by issue:</p> <p>TURN has allocated all of our attorney and consultant time by issue area or activity, as is evident on our attached timesheets (Attachment 2) and in Attachment 4, which shows the allocation of TURN's time included in this request by attorney or expert and issue / activity area. The following codes relate to specific substantive issue and activity areas addressed by TURN.</p>	Noted

Code	Description	Allocation of Time	Hours
#	The work in in this category pertained to substantive issues but was not specific to any one issue area addressed by TURN.	2.60%	125.28
A&G	Work related to Administrative and General issues	1.75%	84.23
Afford	Work related to affordability issues associated with PG&E's request.	3.46%	166.50
AL	Review of PG&E's post-D.17-05-013 Advice Letter regarding the \$300 budget reduction it announced in January 2017	0.04%	2.00
Coord	Work related to coordinating with other intervenors	0.35%	16.75
CustSvc	Work related to PG&E's Customer Care requests	7.97%	383.75
DefWk	Work related to deferred work and reprioritization	0.42%	20.36
Dep	Work related to Depreciation	5.54%	266.75
ElecDist	Work related to Electric Distribution	24.06%	1158.42
GasDist	Work related to Gas Distribution	19.45%	936.58
Gen	Work related to Energy Supply	1.54%	74.25
GP	The work in this category includes activities associated with general participation in this proceeding, such as the initial review of the application and testimony, preparing a protest, attending the PHC, reading ALJ procedural rulings, and reading parties' pleadings as necessary to determine whether TURN should address the issues raised.	1.93%	92.83
HR	Work related to Human Resources issues	3.91%	188.14
JCE	Work related to preparing TURN's portion of the Joint Comparison Exhibit	1.62%	78.14
Non-Sett	Work related to the two issues not resolved by the Settlement Agreement (the third post-test year and gas leak management balancing account)	0.77%	37.25
PD	This work was related to the Proposed Decision and Alternate Proposed Decision which preceded D.17-05-013.	1.33%	64.08
PTYR	Work related to Post-Test Year Ratemaking	4.95%	238.25
RBO	Work related to rate base issues, customer deposits, and other technical and accounting issues (with the exception of depreciation)	1.74%	83.92
Risk/Plan	Work related to risk management and integrating planning	1.80%	86.88

Sett	Work related to settlement negotiations	8.56%	411.94
ShdSvc	Work related to Shared Services	4.92%	236.77
WS/EH	The work in this category was related to participation in workshops and evidentiary hearings conducted by the Commission in this proceeding.	0.76%	36.75
Comp	Intervenor Compensation: work preparing TURN's NOI and Request for Compensation	0.52%	25.00
TOTAL		100.00%	4814.82

If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hayley Goodson, TURN Attorney	2015	74.50	\$355	D.16-10-036	\$26,447.50	74.15 ^[1,3]	\$355	\$26,323.25
Hayley Goodson, TURN Attorney	2016	393.75	\$380	D.17-03-022	\$149,625.00	390.85 ^[1,3,4]	\$380	\$148,523.00
Hayley Goodson, TURN Attorney	2017	36.50	\$405	Res. ALJ-345 (2.14% COLA, plus first 5% step increase in the 13+ year experience tier, rounded to nearest \$5)	\$14,782.50	35 ^[4]	\$405 ⁵	\$14,175.00
Robert Finkelstein, TURN General Counsel	2015	5.00	\$505	D.16-11-004	\$2,525.00	4.8 ^[1,3]	\$505	\$2,424.00

⁵ See D.18-01-020

A.15-09-001 ALJ/SCR/avs

Robert Finkelstein, TURN General Counsel	2016	264.75	\$510	D.16-11-004	\$135,022.50	257.05 ^[1,3,4]	\$510	\$131,095.50
Robert Finkelstein, TURN General Counsel	2017	18.50	\$520	Res. ALJ-345 (2.14% COLA rounded to nearest \$5)	\$9,620.00	15.25 ^[4]	\$520 ⁶	\$7,930.00
Matthew Freedman, TURN Attorney	2015	8.75	\$410	D.16-06-024	\$3,587.50	4.63 ^[2]	\$410	\$1,898.30
Matthew Freedman, TURN Attorney	2016	24.25	\$415	D.16-06-024	\$10,063.75	16.75 ^[2]	\$415	\$6,951.25
Marcel Hawiger, TURN Attorney	2015	33.50	\$410	D.16-11-016	\$13,735.00	33.5	\$410	\$13,735.00
Marcel Hawiger, TURN Attorney	2016	136.25	\$415	D.16-06-024	\$56,543.75	134.93 ^[3,4]	\$415	\$55,995.95
Marcel Hawiger, TURN Attorney	2017	2.50	\$425	Res. ALJ-345 (2.14% COLA rounded to nearest \$5)	\$1,062.50	2.5	\$425 ⁷	\$1,062.50
Thomas J. Long, TURN Legal Director	2015	86.50	\$570	D.16-11-004	\$49,305.00	86.35 ^[1,3]	\$570	\$49,219.50
Thomas J. Long, TURN Legal Director	2016	326.25	\$575	D.16-11-004	\$187,593.75	321.98 ^[1,4]	\$575	\$185,138.50
Thomas J. Long, TURN Legal Director	2017	8.25	\$585	Res. ALJ-345 (2.14% COLA rounded to nearest \$5, and consistent with the	\$4,826.25	8.25	\$585 ⁸	\$4,826.25

⁶ See D.17-11-032

⁷ See D.17-11-032

⁸ See D.18-01-018

				range for attorneys within the 13+ year experience tier)				
Nina Suetake, TURN Attorney	2016	69.75	\$350	See Comment #2	\$24,412.50	69.75	\$350 ⁹	\$24,412.50
Elise Torres, TURN Attorney	2015	13.50	\$215	D.16-04-037	\$2,902.50	13.5	\$215	\$2,902.50
Elise Torres, TURN Attorney	2016	55.50	\$230	D.16-08-015	\$12,765.00	55.5	\$230	\$12,765.00
Elise Torres, TURN Attorney	2017	1.50	\$245	Res. ALJ-345 (2.14% COLA, plus second 5% step increase in the 3-4 year experience tier, rounded to nearest \$5)	\$367.50	1.5	\$245 ¹⁰	\$367.50
Eric Borden, TURN Expert	2015	28.50	\$180	D.16-05-015	\$5,130.00	28.5	\$180	\$5,130.00
Eric Borden, TURN Expert	2016	203.50	\$190	D.17-04-032	\$38,665.00	203.5	\$190	\$38,665.00
Paul Alvarez	2016	160.75	\$275	See Comment #4	\$44,206.25	160.75	\$275	\$44,206.25
Thomas Carter	2016	10.00	\$225	See Comment #4	\$2,250.00	10	\$225	\$2,250.00
Roger Colton	2015	23.00	\$250	See Comment #3	\$5,750.00	23	\$250	\$5,750.00
Roger Colton	2016	116.00	\$250	See Comment #3	\$29,000.00	116	\$250	\$29,000.00
James Garren	2016	172.00	\$145	See Comment #5	\$24,940.00	172	\$145	\$24,940.00

⁹ See D.18-04-021

¹⁰ Application of Res. ALJ-345 – 2.14% Cost of Living Adjustment and second five percent step increase for attorneys with 3-4 years of experience

Garrick Jones	2015	200.10	\$180	See Comment #7	\$36,018.00	200.10	\$180	\$36,018.00
Garrick Jones	2016	445.15	\$190	See Comment #7	\$84,578.50	443.85 ^[3]	\$190	\$84,331.50
Michael Majoros	2016	51.00	\$220	See Comment #5	\$11,220.00	51	\$220	\$11,220.00
William Perea Marcus	2015	9.83	\$280	D.16-07-012	\$2,752.40	7.71 ^[2]	\$280	\$2,158.80
William Perea Marcus	2016	140.16	\$280	D.16-06-024	\$39,244.80	137.08 ^[2,4]	\$280	\$38,382.40
William Perea Marcus	2017	1.33	\$280	2016 Rate	\$372.40	1.33	\$280	\$372.40
Jeffrey A. Nahigian	2015	65.00	\$215	See Comment #6	\$13,975.00	63.23 ^[3]	\$215 ¹¹	\$13,594.45
Jeffrey A. Nahigian	2016	417.00	\$215	See Comment #6	\$89,655.00	401.08 ^[3]	\$215	\$86,232.20
Greg Ruzovan	2015	1.42	\$215	D.16-11-004	\$305.30	1.42	\$215	\$305.30
Greg Ruzovan	2016	21.45	\$215	D.16-11-004 (for 2015)	\$4,611.75	21.45	\$215	\$4,611.75
Dennis Stephens	2016	71.00	\$225	See Comment #4	\$15,975.00	71	\$225	\$15,975.00
John Sugar	2015	283.37	\$220	D.16-11-004	\$62,341.40	283.25 ^[3]	\$220	\$62,315.00
John Sugar	2016	565.01	\$220	D.16-11-004 (for 2015)	\$124,302.20	565.01	\$220	\$124,302.20
Catherine Yap	2015	99.25	\$280	D.16-04-011	\$27,790.00	89.33 ^[1]	\$280	\$25,012.40
Catherine Yap	2016	145.50	\$280	D.17-04-014	\$40,740.00	131.45 ^[1,4]	\$280	\$36,806.00
<i>Total Hours</i>		4789.82						
<i>Subtotal: \$1,409,010.50</i>						<i>Subtotal: \$1,381,324.15</i>		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Hayley Goodson	2015	1	\$177.50	50% of 2015 rate	\$177.50	1	\$177.50	\$177.50
Hayley Goodson	2016	0.5	\$190.00	50% of 2016 rate	\$95.00	0.5	\$190	\$95.00
Hayley	2017	22	\$202.50	50% of	\$4,455.00	22	\$202.50	\$4,455.00

¹¹ Application of first five percent step increase for experts with 13+ year experience to previously approved hourly rate of \$205 authorized in D.16-04-011

Goodson				requested 2017 rate				
Marcel Hawiger	2017	1.5	\$212.50	50% of requested 2017 rate	\$318.75	1.5	\$212.50	\$318.75
<i>Total Hours</i>		25						
<i>Subtotal: \$5,046.25</i>						<i>Subtotal: \$5,046.25</i>		
COSTS								
#	Item	Detail			Amount	Amount		
	Photocopies	Copies related to A.15-09-001			\$55.15	\$55.15		
	Lexis Legal Research	Legal Research related to A.15-09-001			\$117.02	\$117.02		
	Telephone	Telephone expense related to A.15-09-001			\$116.17	\$116.17		
	Postage	Postage for mailing filings in A.15-09-001			\$13.05	\$13.05		
<i>Subtotal: \$301.39</i>						<i>Subtotal: \$301.39</i>		
<i>TOTAL REQUEST: \$1,414,358.14</i>						<i>TOTAL AWARD: \$1,386,671.79</i>		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate</p>								

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR¹²	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Hayley Goodson	December 2003	228535	No
Robert Finkelstein	June 1990	146391	No
Matthew Freedman	March 2001	214812	No
Marcel Hawiger	January 1998	194244	No
Thomas Long	December 1986	124776	No
Nina Suetake	December 2004	234769	No
Elise Torres	December 2011	280443	No

**C. Attachments Documenting Specific Claim and Comments on Part III
(attachments not attached to final Decision):**

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheets for TURN’s Attorneys and Experts
Attachment 3	TURN Direct Expenses Associated with D.17-05-013
Attachment 4	TURN Hours Allocated by Issue
Comment 1	<p>2017 Hourly Rates for TURN Attorneys</p> <p><u>Hayley Goodson</u> For Ms. Goodson’s work in 2017, TURN seeks an hourly rate of \$405, an increase of 7.14% from the previously awarded rate of \$380 for 2016. This increase is the general 2.14% COLA provided for in Res. ALJ-345, plus the first of two 5% step increases for Ms. Goodson since her move into 13+ year experience tier, as authorized in Res. ALJ-345. <i>See also</i> D.17-03-022, p. 30 (recognizing Ms. Goodson’s move into the 13+ year experience tier).</p> <p><u>Elise Torres</u> For Ms. Torres’ work in 2017, TURN seeks an hourly rate of \$245, an increase</p>

¹² This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

	<p>of 7.14% from the previously awarded rate of \$230 for 2016. This increase is the general 2.14% COLA provided for in Res. ALJ-345, plus the second of two 5% step increases within the 3-4 year experience tier, authorized in Res. ALJ-345. <i>See also</i> D.16-08-015, pp. 11-12 (adopting a 2016 rate of \$230 for Ms. Torres, and reflecting TURN's explanation that this rate reflects the first of two 5% step increases within the 3-4 year experience tier).</p> <p><u>Robert Finkelstein, Marcel Hawiger, and Thomas Long</u> TURN asks that the Commission adopt 2017 rates for Mr. Finkelstein, Mr. Hawiger, and Mr. Long, equal to their authorized 2016 rates, escalated by the 2.14% COLA adopted in Resolution ALJ-345.</p>
Comment 2	<p>2016 Hourly Rate for Nina Suetake</p> <p>TURN asks the Commission to adopt an hourly rate of \$350 for Ms. Suetake's work in 2016. This is the same rate requested by TURN in the Request for Intervenor Compensation we filed on August 30, 2016, in A.13-12-012 et al. for Contribution to Decisions D.14-11-041, D.15-06-035, and D.16-06-056. In that request, which is still pending, TURN presented the following showing in support of this requested rate:</p> <p>For Ms. Suetake's 2016 rate, TURN asks the Commission to adopt an hourly rate of \$350. Ms. Suetake is a 2004 law school graduate, was admitted to the California Bar in late 2004, and has worked on regulatory matters before the CPUC since that time. She became a TURN staff attorney in 2004, left TURN in 2014 to explore other options for CPUC regulatory work (as a staff attorney for a water utility), then rejoined the organization in 2016. For purposes of the hourly rate schedule established by the Commission, she is now in the 8-12 year experience band adopted in D.08-04-010.</p> <p>The Commission had previously authorized an hourly rate of \$320 for Ms. Suetake's work in 2013 (D.14-05-015). Applying the 2014 COLA of 2.56% results in a 2014 rate of \$330 (rounded to the nearest \$5 increment).¹³ The rate would have remained the same in 2015, when the COLA was 0%. For 2016, the Commission adopted a COLA of 1.28% (Res. ALJ-329). The hourly rate of \$350 for 2016 represents the COLA increase plus 5% for the first of the two "step" increases provided for within each experience band.¹⁴</p> <p>TURN reasonably believes the information here will be a sufficient showing in</p>

¹³ \$320 times 1.0256 equals \$328.19. The compensation awards that included 2014 hours for Ms. Suetake used her 2013 authorized rate without a COLA increase because TURN tends to use the previous year's authorized rate where the number of hours in the following year is relatively small. (D.15-08-016.)

¹⁴ \$330 times 1.0628 equals \$350.72.

	support of the requested increase. Should the Commission believe more or different information is warranted to provide further support for this request here, TURN requests that it be so notified and given the opportunity to supplement its showing.
Comment 3	<p>Hourly Rate for Roger D. Colton of Fisher, Sheehan & Colton</p> <p>This TURN's first request for compensation that includes work performed by Roger Colton, who served as TURN's witness on affordability issues. TURN requests an hourly rate of \$250 for Mr. Colton's work in this proceeding, which spanned 2015-2016. This is the hourly rate billed by Mr. Colton to TURN. The Commission has not previously adopted an authorized rate for this expert. In accordance with D.08-04-010, TURN demonstrates in this section that the requested hourly rates are within the adopted ranges and consistent with rates previously awarded to representatives with comparable training and experience.</p> <p>Mr. Colton is by all accounts an expert on low-income utility issues. For more than 30 years, he has done regulatory work on rate and customer service issues, as well as research into low-income usage, payment patterns, and affordability programs, on behalf of government, nonprofit, and industry clients throughout the United States and Canada. Mr. Colton has served as an expert witness before legislative, regulatory, and judicial bodies on numerous occasions regarding energy, water and telecommunications issues affecting low-income customers, and has testified in regulatory proceedings in more than 30 states and various Canadian provinces. Mr. Colton has developed utility low-income assistance programs for utilities, and has been hired by various State and Federal government entities to develop low-income program evaluation tools, to study the health, and safety impacts of unaffordable home energy, as well as the impacts of unaffordable home energy on education, housing affordability, and economic development. He has a law degree and a Masters Degree in Regulatory Economics, and has published extensively on low-income utility and housing issues, in addition to preparing technical reports for clients on low-income utility issues. (See Ex. TURN-13, pp. 1-2). His CV appears as Appendix A to his testimony on behalf of TURN, Ex. TURN-13.</p> <p>Mr. Colton's hourly rate of \$250 falls in the bottom third of the range of rates for 2015 and 2016 adopted by the Commission in Res. ALJ-345 for experts with more than 13 years of experience, \$170-\$420 (2015) and \$170-\$425 (2016).</p> <p>For comparison's sake, TURN points the Commission to the hourly rates adopted for expert John Howat of the National Consumer Law Center (NCLC), whose experiences are similar to Mr. Colton's. Mr. Howat, like Mr. Colton, has extensive experience addressing utility regulatory issues impacting low-income customers across the United States. His work has focused on the design and implementation of low-income energy affordability and efficiency programs and</p>

	<p>outreach efforts, low-income regulatory consumer protection, rate design, issues related to metering and billing, development and analysis of utility arrearage and customer service data, energy burden analysis and related demographic analysis. He has appeared before a number of state utility commissions and authored resources for low-income utility customer advocates. Both Mr. Howat and Mr. Colton have been involved with low-income utility issues since the early 1980s. Mr. Howat, like Mr. Colton, has a Masters Degree, although Mr. Colton additionally has a law degree. (See NCLC's Request for Intervenor Compensation, filed in I.07-01-022 et al. on Oct. 24, 2008, Attachments 4, 5, and 6). In D.09-05-017, issued in I.07-01-022, the Commission adopted a <u>2007</u> hourly rate of \$230 and a <u>2008</u> hourly rate of \$235 for Mr. Howat. The Commission increased Mr. Howat's rate to \$240 for his work in 2012 in D.13-04-009.</p> <p>If one were to apply the COLAs adopted by the Commission for 2013 (2%, per Res. ALJ-287), 2014 (2.58%, per Res. ALJ-303), 2015 (0%, per Res. ALJ-308), and 2016 (1.28%, per Res. ALJ-329), to Mr. Howat's 2012 rate of \$240, the result would be a \$250 rate in 2015 and a \$255 rate in 2016 (rounded to the nearest \$5).</p> <p>For all of these reasons, TURN submits that the Commission should find that an hourly rate of \$250 for Mr. Colton's work in 2015 and 2016 is reasonable.</p>
Comment 4	<p>Hourly Rates for The Wired Group Experts</p> <p>TURN requests that the Commission adopt an hourly rate of \$275 for Mr. Alvarez, \$225 for Mr. Stephens, and \$225 for Mr. Carter, which are the actual rates billed by the Wired Group for the services of these experts. The Commission has not previously adopted an authorized rate for these experts. In accordance with D.08-04-010, TURN demonstrates in this section that the requested hourly rates are within the adopted ranges and consistent with rates previously awarded to representatives with comparable training and experience.</p> <p>A detailed summary of the resumes of these experts is provided in the "Reasonableness of Hours" section above. Their complete resumes for Mr. Alvarez and Mr. Stephens are included as Appendices A and B to Exhibit TURN-5. Mr. Alvarez has over fifteen years of experience in the utility sector, including seven years working for Xcel Energy in product development for demand-side management products and services. Prior to his utility work, Mr. Alvarez had over fifteen years of experience in product management and product development with senior level positions at large Fortune 500 corporations. Mr. Stephens has over forty years' experience in the utility sector, including thirty-five years (1975-2011) working as an engineer with increasing responsibilities for Xcel Energy. Mr. Carter likewise has over thirty years of relevant technical experience in distribution asset management and load management.</p>

The requested

Last Name	First Name	Type	Intervenor	Rate	Year	Decision #
Baak	Jim	Expert	The Vote Solar Initiative (Vote Solar)	\$280	2014	D1506026
Barsimantov	James	Expert	Sierra Club	\$215	2014	D1507026
Blinz	Ronald	Expert	Sierra Club	\$180	2014	D1510008
Brand	Erica	Expert	The Nature Conservancy	\$220	2014	D1510013
Brown	Michael	Expert	Small Business Utility Advocates (SBUA)	\$200	2015	D1512042
Contreras	Henry	Expert	Center for Accessible Technology (CforAT)	\$250	2014	D1503013; D1511036
Croyle	David	Expert	Utility Consumers' Action Network (UCAN)	\$235	2015	D1512040
Delfin-Polk	Dyana	Expert	Clean Coalition	\$200	2014	D1506027
Doherty	Patrick	Expert	Pacific Forest Trust (PFT)	\$285	2014	D1511039
Flaherty	Ryan	Expert	Sustainable Conservation	\$240	2015	D1508021
Hodges	James	Expert	Association of California Community and Energy Services (ACCES)	\$335	2014	D1506014
Marcus	William	Expert	The Utility Reform Network (TURN)	\$270	2015	D1510043; D1512043
Mitchell	Joseph	Expert	Mussey Grade Road Alliance	\$285	2014	D1503010; D1507030
Morris	Gregory	Expert	The Green Power Institute (Green Power) (GPI)	\$270	2015	D1509021
Moss	Steven	Expert	Environmental Defense Fund (EDF)	\$215	2014	D1509016; D1512041
Mulvaney	Dustin	Expert	Sierra Club	\$205	2014	D1507026
Prange	Jaclyn	Expert	Natural Resources Defense Council (NRDC)	\$245	2014	D1411018
White	Sahm/Kenneth	Expert	Clean Coalition	\$295	2014	D1510044
Woodruff	Kevin	Expert	The Utility Reform Network (TURN)	\$250	2014	D1505026

hourly rates of \$275 and \$225 are thus at the low end of the approved range of \$170-\$425 for experts with more than 13 years of experience (Resolution ALJ-329, p. 4), reflecting the fact that the Wired Group charges discounted rates for consumer and environmental advocates.

The requested hourly rates are comparable to rates adopted in 2014-2015 for experts with comparable experience, which range from about \$180 to \$335, as shown in the following excerpt from the hourly rate table:

Comment 5

2016 Hourly Rates for Snively, King, Majoros & Associates Experts

Snively, King, Majoros & Associates charged TURN \$220 per hour for work performed by Michael Majoros in 2016. This is below the \$240 per hour the Commission found reasonable for his work performed in 2005 (that is, more than ten years earlier) in the SCE 2005 GRC (D.06-10-018). The Commission

	<p>should find Mr. Majoros' current rate of \$220 reasonable based on that earlier finding.</p> <p>Snively, King, Majoros & Associates charged TURN \$145 per hour for work performed by James Garren in 2016. TURN is requesting compensation for the work of James Garren for the first time in this proceeding. Mr. Garren is a consultant with the firm, and his statement of qualifications (Appendix A to his testimony) highlights his training as a depreciation expert and his prior experience as a witness sponsoring testimony produced by the firm. In 2016, he had approximately six years of experience with the firm. The \$145 hourly rate is very near the lowest end of the range the Commission has adopted for work performed in 2016 by expert witnesses with 0-6 years of experience (\$140-\$205, per Res. ALJ-345). TURN submits that the requested \$145 hourly rate is extremely reasonable for work performed in 2016 by someone with Mr. Garren's credentials and qualifications.</p>
Comment 6	<p>2015, 2016 Hourly Rates for Jeffrey Nahigian</p> <p>TURN requests an hourly rate of \$215 for Jeffrey Nahigian's work in this proceeding in both 2015 and 2016. This is the actual market rate charged by Mr. Nahigian to TURN.</p> <p>In D.15-08-023 (PG&E 2014 GRC), the Commission adopted a rate of \$210 for Mr. Nahigian's work in 2014 by applying the 2014 COLA to his 2013 authorized rate of \$205. However, in D.16-04-011 (SCE 2015 GRC), the Commission adopted a rate of \$205 for his work in 2014. TURN had requested this lower rate because it was his actual billing rate in 2014. The Commission can reconcile these two different rates in the setting of Mr. Nahigian's 2015 rate.</p> <p>TURN recommends that the Commission authorize a 2015 rate of \$215 for Mr. Nahigian by applying a 5% step increase to the lower of the two rates previously authorized for him in 2014, \$205. TURN has not previously used a 5% step increase, as permitted by D.07-01-009 and D.08-04-010, to justify a rate increase for Mr. Nahigian, who has long been in the 13+ year experience tier for experts. Escalating the 2014 rate of \$205 by 5% produces a 2015 rate of \$215, consistent with TURN's request here.</p> <p>The Commission could alternatively escalate the higher rate authorized for Mr. Nahigian in 2014, \$210, by the 2016 COLA of 2.14% (Res. ALJ-345), to produce the requested \$215 billing rate in 2016. However, as there was no COLA for 2015, TURN requests that the Commission apply the "step increase" justification to support the rate of \$215 for both 2015 and 2016. As noted above, this is the actual hourly rate that Mr. Nahigian has billed TURN at in 2015 and 2016.</p>

Comment 7	<p>2015, 2016 Hourly Rates for Garrick Jones, JBS Energy</p> <p>TURN requests an hourly rate of \$180 for the work performed by Garrick Jones of JBS Energy in this proceeding in 2015. The Commission has previously adopted rates of \$180 and \$185 for Mr. Jones' work in 2015. <i>See, e.g.</i>, D.16-04-011 (SCE 2015 GRC) (adopting a 2015 hourly rate of \$180); D.16-11-004 (Sempra 2016 GRC) (adopting a 2015 hourly rate of \$185).</p> <p>TURN requests an hourly rate of \$190 for Mr. Jones' work in 2016. The Commission has yet to adopt a rate for Mr. Jones' 2016 work. A rate of \$190 for Mr. Jones' work in 2016 is reasonable for the following reasons.</p> <p>In D.15-11-019 (2012 Nuclear Decommissioning) the Commission adopted a rate of \$180 for Mr. Jones' work in the last quarter of 2014, commensurate with the time period when JBS Energy increased his hourly rate to \$180. At that time, the Commission calculated Mr. Jones' experience as just over 7 years, and found that an increase from \$170 to \$180 in 2014 was reasonable as the first 5% step increase within the 7-12 year experience tier. D.15-11-019, p. 23. As noted above, the Commission has adopted rates of both \$180 and \$185 for Mr. Jones in 2015. However, TURN assumes that the Commission will adopt the lower rate of \$180 here for Mr. Jones' 2015 work. Escalating that rate by both the 2016 COLA of 1.28% and also the second 5% step increase in the 7-12 year tier, for a total increase of 6.28%, results in a rate of \$190 (rounded down to the nearest \$5 increment).</p>
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D. CPUC Disallowances and Adjustments:

Item	Reason
Adoption of Hourly Rates	<p>TURN requests an hourly rate of \$250 for work performed by Colton in 2015. Colton has over 30 years regulatory experience working on rate and customer service issues and served as an expert witness before legislative, regulatory, and judicial bodies on numerous occasions regarding energy, water and telecommunications. The Commission finds reasonable an hourly rate of \$250 for Colton in 2015.</p> <p>TURN requests an hourly rate of \$275 for work performed by Alvarez in 2016. Alvarez has over fifteen years of experience in the utility sector, including seven years working for Xcel Energy in product development for demand-side management products and services. The Commission finds reasonable an hourly rate of \$275 for Alvarez in 2016.</p> <p>TURN requests an hourly rate of \$225 for work performed by Stephens in 2016. During his 35-year tenure with Xcel Energy, he worked as an electrical engineer in distribution operations with increasing responsibility in areas of distribution design, planning, operations management, and asset management. In 2009, he established a DER integration strategy and capability road-map. The Commission finds reasonable an hourly rate of \$225 for Stephens in 2016.</p>

	<p>TURN requests an hourly rate of \$225 for work performed by Carter in 2016. Carter has a Bachelor's degree in Electrical Engineering from the University of Colorado and over thirty years of relevant technical experience in distribution asset management and load management. The Commission finds reasonable an hourly rate of \$225 for Carter in 2016.</p> <p>TURN requests an hourly rate of \$220 for work performed by Marjoros in 2016. In D.06-10-018 the Commission found an hourly rate of \$240 for work performed by Marjoros in 2005. We adopt the requested rate.</p> <p>TURN requests an hourly rate of \$145 for work performed by Garren in 2016. Garren has served as a consultant with Snavely, King, Majoros & Associates since 2010, providing expert witness testimony to clients, specializing in the area of depreciation. He is a member of, and has been made a Certified Depreciation Professional, by the Society of Depreciation Professionals. The Commission finds reasonable an hourly rate of \$145 for Garren in 2016.</p>
[1] Outcome on Overall Revenue Requirement	The Settlement Agreement adopted fixed dollar amounts rather than TURN's proposed forecast model in regards to PG&E's Post-Test Year Ratemaking Adjustments for 2018-2019. However, TURN's efforts contributed to the overall reductions and to providing cost containment incentives. Therefore, we disallow 10% of the hours allocated to the Post-Test Year Ratemaking related to the proposed forecast model which was not adopted in the Settlement Agreement.
[2] Energy Supply	As TURN acknowledges, the issues raised by TURN regarding license renewal for Diablo Canyon were resolved by PG&E's decision to seek Commission approval to retire Diablo Canyon at the end of its current NRC licenses. TURN should not be compensated for its work on license renewal issues (i.e., Exhibit TURN-06, Section II.A., "Diablo Canyon Nuclear Plant, Policy"), because the Commission has already addressed PG&E's request in D.18-01-022 in A.16-08-006. Therefore, we reduce both Marcus' and Freedman's claimed hours for Diablo Canyon-related work by 50%.
[3] Shared Service	The hours claimed by TURN are excessive based on the scope of this topic. As such, we disallow 10% of the 236.77 hours claimed pertaining to shared services.
[4] Tax Accounting	TURN's efforts in settlement negotiations made no contribution to the Commission's decision regarding the tax memorandum account adopted in D.17-05-013. Therefore the hours are non-compensable due to lack of significant contribution.

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.17-05-013.
2. The requested hourly rates for The Utility Reform Network's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$1,386,671.79.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$1,386,671.79.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company shall pay The Utility Reform Network the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning September 30, 2017, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated February 21, 2019, at San Francisco, California.

MICHAEL PICKER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D1902019	Modifies Decision?	No
Contribution Decision:	D1705013		
Proceeding:	A1509001		
Author:	ALJ Roscow		
Payer:	Pacific Gas and Electric Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network (TURN)	July 17, 2017	\$1,414,358.14	\$1,386,671.79	N/A	See CPUC Disallowances and Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Hayley	Goodson	Attorney	TURN	\$355	2015	\$355
Hayley	Goodson	Attorney	TURN	\$380	2016	\$380
Hayley	Goodson	Attorney	TURN	\$405	2017	\$405
Robert	Finkelstein	Attorney	TURN	\$505	2015	\$505
Robert	Finkelstein	Attorney	TURN	\$510	2016	\$510
Robert	Finkelstein	Attorney	TURN	\$520	2017	\$520
Matthew	Freedman	Attorney	TURN	\$410	2015	\$410
Matthew	Freedman	Attorney	TURN	\$415	2016	\$415
Marcel	Hawiger	Attorney	TURN	\$410	2015	\$410
Marcel	Hawiger	Attorney	TURN	\$415	2016	\$415
Marcel	Hawiger	Attorney	TURN	\$425	2017	\$425
Thomas	Long	Attorney	TURN	\$570	2015	\$570
Thomas	Long	Attorney	TURN	\$575	2016	\$575
Thomas	Long	Attorney	TURN	\$585	2017	\$585
Nina	Suetake	Attorney	TURN	\$350	2016	\$350
Elise	Torres	Attorney	TURN	\$215	2015	\$215
Elise	Torres	Attorney	TURN	\$230	2016	\$230
Elise	Torres	Attorney	TURN	\$245	2017	\$245
Eric	Borden	Expert	TURN	\$180	2015	\$180
Eric	Borden	Expert	TURN	\$190	2016	\$190

Paul	Alvarez	Expert	TURN	\$275	2016	\$275
Thomas	Carter	Expert	TURN	\$225	2016	\$225
Roger	Colton	Expert	TURN	\$250	2015	\$250
Roger	Colton	Expert	TURN	\$250	2016	\$250
James	Garren	Expert	TURN	\$145	2016	\$145
Garrick	Jones	Expert	TURN	\$180	2015	\$180
Garrick	Jones	Expert	TURN	\$190	2016	\$190
Michael	Majoros	Expert	TURN	\$220	2016	\$220
William	Perea Marcus	Expert	TURN	\$280	2015	\$280
William	Perea Marcus	Expert	TURN	\$280	2016	\$280
William	Perea Marcus	Expert	TURN	\$280	2017	\$280
Jeffrey	Nahigian	Expert	TURN	\$215	2015	\$215
Jeffrey	Nahigian	Expert	TURN	\$215	2016	\$215
Greg	Ruszovan	Expert	TURN	\$215	2015	\$215
Greg	Ruszovan	Expert	TURN	\$215	2016	\$215
Dennis	Stephens	Expert	TURN	\$225	2016	\$225
John	Sugar	Expert	TURN	\$220	2015	\$220
John	Sugar	Expert	TURN	\$220	2016	\$220
Catherine	Yap	Expert	TURN	\$280	2015	\$280
Catherine	Yap	Expert	TURN	\$280	2016	\$280

(END OF APPENDIX)